

FILED
 UNITED STATES DISTRICT COURT
 ALBUQUERQUE, NEW MEXICO
Ur JUL 27 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,	CRIMINAL NO. <u>18-2424/MV</u>
)
vs.	Counts 1-28: 18 U.S.C. § 1343: Wire
)
CHARLES BRUCE SANDIDGE,	Fraud;
)
Defendant.	Count 29: 18 U.S.C. § 1030(a)(4):
)
	Fraud in Connection with Computers.

I N D I C T M E N T

The Grand Jury charges:

The Scheme

1. From on or about August 14, 2017, through on or about November 15, 2017, both dates being approximate and inclusive, in Bernalillo County and Santa Fe County, in the District of New Mexico, the defendant **CHARLES BRUCE SANDIDGE**, devised and intended to devise a scheme to defraud S.S. and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

2. It was a part of the scheme that **CHARLES BRUCE SANDIDGE** used his status as a person hired by S.S. to perform video photography and video editing work in S.S.'s home to access S.S.'s personal computer and account information.

3. In so doing, **CHARLES BRUCE SANDIDGE** accessed some of S.S.'s financial accounts through S.S.'s personal computer. The financial accounts included S.S.'s PayPal account that was linked to S.S.'s Charles Schwab account. **CHARLES BRUCE SANDIDGE** also accessed S.S.'s PayPal account from his home by using his personal electronic devices.

4. For the purpose of executing and in order to effect the scheme to defraud,

CHARLES BRUCE SANDIDGE transferred by means of wire communications in interstate commerce funds belonging to S.S. and held in S.S.'s Charles Schwab and PayPal accounts into his personal PayPal account, on the dates and in the dollar amounts listed below:

Count	Date	Time	Type	Gross	Fee	Net
1	8/14/17	10:58:55 am	Credit card payment received	\$183.00	\$5.61	\$177.39
2	8/15/17	11:09:22 am	Credit card payment received (personal)	\$131.00	\$0	\$131.00
3	8/17/17	10:13:01 am	Credit card payment received (personal)	\$317.00	\$0	\$317.00
4	8/22/17	8:11:06 am	Credit card payment received (personal)	\$245.00	\$0	\$245.00
5	8/23/17	12:05:19 pm	Payment received (personal)	\$418.00	\$0	\$418.00
6	8/25/17	11:37:41 am	Credit card payment received (personal)	\$323.00	\$0	\$323.00
7	8/29/17	10:26:23 am	Instant transfer received (personal)	\$2,455.00	\$0	\$2,455.00
8	9/1/17	8:57:24 am	Instant transfer received (personal)	\$3,870.00	\$0	\$3,870.00
9	9/6/17	7:33:33 am	Instant transfer received (personal)	\$4,480.00	\$0	\$4,480.00
10	9/8/17	10:03:13 am	Instant transfer received (personal)	\$5,350.00	\$0	\$5,350.00
11	9/12/17	7:27:20 am	Instant transfer received (personal)	\$3,850.00	\$0	\$3,850.00
12	9/13/17	9:33:59 am	Instant transfer received (personal)	\$1,755.00	\$0	\$1,755.00
13	9/18/17	9:19:05 am	Instant transfer received (personal)	\$5,785.00	\$0	\$5,785.00
14	9/20/17	7:41:18 am	Instant transfer received (personal)	\$6,125.00	\$0	\$6,125.00
15	9/28/17	8:22:04 am	Instant transfer received (personal)	\$7,550.00	\$0	\$7,550.00
16	10/2/17	7:51:49 am	Instant transfer received (personal)	\$8,250.00	\$0	\$8,250.00
17	10/9/17	9:49:25 am	Instant transfer received (personal)	\$5,780.00	\$0	\$5,780.00
18	10/11/17	7:22:11 am	Instant transfer received (personal)	\$8,450.00	\$0	\$8,450.00

19	10/13/17	7:26:59 am	Instant transfer received (personal)	\$8,675.00	\$0	\$8,675.00
20	10/16/17	8:27:59 am	Instant transfer received (personal)	\$7,985.00	\$0	\$7,985.00
21	10/24/17	8:15:16 am	Instant transfer received (personal)	\$4,675.00	\$0	\$4,675.00
22	10/24/17	7:21:41 am	Instant transfer received (personal)	\$9,350.00	\$0	\$9,350.00
23	10/25/17	9:24:03 am	Instant transfer received (personal)	\$5,655.00	\$0	\$5,655.00
24	10/31/17	9:37:22 am	Instant transfer received (personal)	\$5,850.00	\$0	\$5,850.00
25	10/31/17	7:56:24 am	Instant transfer received (personal)	\$9,350.00	\$0	\$9,350.00
26	11/2/17	9:24:42 am	Instant transfer received (personal)	\$9,375.00	\$0	\$9,375.00
27	11/2/17	8:16:43 am	Instant transfer received (personal)	\$9,375.00	\$0	\$9,375.00
TOTAL LOSS				\$135,601.39		

In violation of 18 U.S.C. § 1343.

Count 28

1. The factual allegations in paragraphs 1 through 4 of Counts 1 through 27 are realleged as if set forth fully herein.
2. For the purpose of executing and in order to effect the scheme to defraud set out in Counts 1 through 27, on or about November 15, 2017, in Santa Fe County, in the District of New Mexico, **CHARLES BRUCE SANDIDGE** transmitted a wire communication in interstate commerce, to wit: an e-mail communication to PayPal, falsely stating that the funds transferred from S.S.'s PayPal account to his own constituted payment for video editing work.

In violation of 18 U.S.C. § 1343.

Count 29

1. The factual allegations in paragraphs 1 through 4 of Counts 1 through 27 are realleged as if set forth fully herein.

2. From on or about September 26, 2017, through on or about October 31, 2017, both dates being approximate and inclusive, in Bernalillo County, in the District of New Mexico, the defendant **CHARLES BRUCE SANDIDGE**, knowingly and with intent to defraud accessed a protected computer, exceeding his authorized access, and by means of such conduct furthered the intended fraud and obtained something of value, specifically more than \$5,000 of United States currency belonging to S.S.

In violation of 18 U.S.C. § 1030(a)(4).

A TRUE BILL:

Roguel Ray Cl. /s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

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